

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Charlottesville Division**

**ELIZABETH SINES, ET AL.,**

Plaintiffs,

v.

**JASON KESSLER, ET AL.,**

Defendants.

Civil Action No. 3:17-cv-00072

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**DEFENDANTS' HILL, TUBBS & LEAGUE OF THE SOUTH'S MOTION FOR  
PERMISSION TO FILE A MEMORANDUM THAT EXCEEDS 25 PAGES**

COME NOW Defendants Michael Hill, Michael Tubbs, and League of the South, by counsel, pursuant to this Court's scheduling order and request permission to file a Memorandum in Support of a Motion for Summary Judgment that exceeds 25 pages. In support, Defendants submit as follows

1. Defendants Hill, Tubbs, and the League of the South intend to file a single Motion and Memorandum in Support, rather than three individual Motions and Memorandum. Because all three Defendants will be filing a single Motion and Memorandum, additional facts and argument are necessary, above and beyond what would be necessary for a single Defendant filling individually.
2. This case is unusually complex. Over twenty depositions have been taken and hundreds of thousands of documents have been produced and exchanged in discovery. The process has taken almost three years.
3. The large number of Plaintiffs and Defendants also make the issues and material facts more complicated than normal.

For those reasons, Counsel for Defendants Hill, Tubbs, and the League of the South requests permission to file a Memorandum in Support of a Motion for Summary Judgment that exceeds the 25 page limit. Counsel for Defendants anticipates the Memorandum in Support of the Motion for Summary Judgment to be approximately 46 pages.

Respectfully submitted,

/s/ Bryan J. Jones  
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*Counsel for Defendants for Michael Hill,  
Michael Tubbs, and League of the South*

**CERTIFICATE OF SERVICE**

I certify that on the 6th day of August, 2020, a true and correct copy of the foregoing Motion for Summary Judgment was electronically filed with the Clerk of the Court using the CM/ECF system, which will provide electronic notice to all counsel of record.

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I further hereby certify that on August 6, 2020, I also served the following non-ECF participants, via electronic mail, as follows:

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